

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DRESSER-RAND COMPANY

Plaintiff,

v.

**SCHUTTE & KOERTING
ACQUISITION COMPANY, *et al.*,**

Defendants.

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CIVIL ACTION NO. 4:12-cv-00184

**S&K’S MOTION FOR LEAVE TO TAKE UP TO THREE DEPOSITIONS
IN EXCESS OF RULE 30’S DEFAULT LIMIT**

Defendant Schutte & Koerting Acquisition Company (“S&K”) files this Motion for Leave to take up to three depositions in excess of FEDERAL RULE OF CIV. P. 30’s default limit of ten (10).

On March 27, 2017, Plaintiff Dresser Rand Company (“Dresser”) amended its disclosures, and added five previously undisclosed witnesses to the list of those persons Dresser may call at trial. With these additions, Dresser has now identified nine current or former Dresser employees and four experts. In light of these additions, S&K anticipates that it may exceed Rule 30’s default limit of ten depositions per side. Thus on March 29, 2017, counsel S&K called counsel for Dresser and requested that Dresser agree to permit S&K to take up to three short depositions in excess of Rule 30’s default limit. On March 31, 2017, counsel for Dresser rejected S&K’s request. Accordingly, S&K respectfully requests that this Court permit it to take up to three short depositions in excess of Rule 30’s default limit of ten.

Respectfully submitted,

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CERTIFICATE OF CONFERNECE

The undersigned conferred with counsel for Dresser on March 29, 2017. Counsel for Dresser does not agree to the relief requested in this Motion.

s/Joseph W. Golinkin II

Joseph W. Golinkin II

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of April, 2017. I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to the following attorneys of record who are filing users of the Court's Electronic Filing System:

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